

EXHIBIT A



TO: Jason Engel, Senior Vice President & General Counsel
Experian
475 Anton Blvd Bldg D
Costa Mesa, CA 92626-7037

RE: Process Served in Minnesota

FOR: Experian Information Solutions, Inc. (Domestic State: OH)

**Service of Process
Transmittal**

10/20/2020
CT Log Number 538432498

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Brock Freese, etc., Pltf. vs. Experian Information Solutions, Inc., Dft.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # NONE

ON WHOM PROCESS WAS SERVED: CT Corporation System, Inc, Saint Paul, MN

DATE AND HOUR OF SERVICE: By Process Server on 10/20/2020 at 13:03

JURISDICTION SERVED : Minnesota

APPEARANCE OR ANSWER DUE: -

ATTORNEY(S) / SENDER(S): None Specified

REMARKS: Please note the process server underlined, circled, initialed and/or highlighted the entity name being served prior to receipt.

ACTION ITEMS: CT has retained the current log, Retain Date: 10/21/2020, Expected Purge Date: 10/26/2020

Image SOP

Email Notification, Jason Engel marina.velardi@experian.com

Email Notification, Gail Fitzpatrick gail.fitzpatrick@experian.com

Email Notification, April Williams april.williams@experian.com

Email Notification, Francis Santos francis.santos@experian.com

SIGNED: CT Corporation System, Inc

ADDRESS: 1999 Bryan Street
Suite 900
Dallas, TX 75201

For Questions: 866-665-5799
SouthTeam2@wolterskluwer.com



Please note that the documents attached are of poor quality and the enclosed scan is of the best quality attainable. If you require improved quality documents, please contact the serving party.

Please note that the documents appear to possibly be missing pages, but documents were scanned as received.

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CASE TYPE: CIVIL OTHER/MISC.

Court File No. Unfiled
Assigned Judge: Unassigned

Brock Freese *fka* Burak L Uzunoglu,
Plaintiff,

vs.

Experian Information Solutions, Inc.,
Defendant.

SUMMONS

THIS SUMMONS IS DIRECTED TO Experian Information Solutions, Inc.

1. YOU ARE BEING SUED. The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this summons.

2. YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS. You must give or mail to the person who signed this summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this summons located at:

5201 Eden Avenue
Suite 300
Edina, MN 55436

3. YOU MUST RESPOND TO EACH CLAIM. The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS

SUMMONS. If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the complaint. If you do not want to contest the claims stated in the complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the complaint.

5. LEGAL ASSISTANCE. You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

6. ALTERNATIVE DISPUTE RESOLUTION. The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: October 20, 2020

Respectfully Submitted,

PETERSON LEGAL, PLLC

/s/ Ryan D. Peterson
Ryan D. Peterson (#0389607)
5201 Eden Avenue, Suite 300
Edina, MN 55436
(612) 367-6568
ryan@peterson.legal

ATTORNEY FOR PLAINTIFF

**STATE OF MINNESOTA
COUNTY OF HENNEPIN**

**DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CASE TYPE: CIVIL OTHER/MISC.**

Court File No. Unfiled
Assigned Judge: Unassigned

Brock Freese *fka* Burak L Uzunoglu,
Plaintiff,

vs.

Experian Information Solutions, Inc.,
Defendant.

COMPLAINT

PLAINTIFF, as and for his cause of action (i.e., violation of the Fair Credit Reporting Act) against the above-named defendant, states and alleges as follows:

Introduction

1. The following case alleges violations of the federal Fair Credit Reporting Act. Nearly a decade ago, Plaintiff Brock Freese allegedly defaulted on an automobile loan with Nevada State Bank ZB, N.A. based in Las Vegas. Many years later, Nevada State Bank placed the deficiency balance on the loan with a third-party collection agency in order to collect amounts it contended were due and owing. Despite the fact that any credit reporting and litigation on the account would have been time-barred, the debt was placed on Plaintiff's credit report with Defendant.

Even after he disputed the placement of this obsolete information, Defendant confirmed the information as accurate. Consequently, Plaintiff brings this lawsuit.

Statement of Jurisdiction

2. This Court has Jurisdiction over the subject matter of this action pursuant to Minn. Stat. §484.01 and the Fair Credit Reporting Act, 15 U.S.C. §§1681n & o.

Venue

3. Venue is proper pursuant to Minn. Stat. §542.09 because the cause of action arose within the State of Minnesota and the County of Hennepin.

Parties

4. Plaintiff Brock Freese is an adult resident of Washington County, Minnesota.

5. Defendant Experian Information Solutions, Inc., (“Experian”) is a foreign corporation registered to conduct business in the state of Minnesota.

Facts

6. Plaintiff is, and at all times mentioned herein was, a “consumer” as defined by 15 U.S.C. §1692a(3).

7. Over ten years ago, Plaintiff allegedly obtained an automobile loan (“the Account”) through Nevada State Bank ZB, N.A. (“Nevada State Bank”).

8. Upon information and belief, the Account allegedly became delinquent and Nevada State Bank charged off the Account on or about February 17, 2011.

9. For over seven (7) years, neither Plaintiff nor anyone else made payment on the Account.

10. During this time, Plaintiff continued to own the vehicle (“the Vehicle”) that was the subject of the Account.

11. In late 2018, Plaintiff decided that he no longer had use for the Vehicle and wanted to either donate it to a charity or give it away.
12. To that end, Plaintiff contacted Nevada State Bank to see what he needed to do in order to get Nevada State Bank's lien released from the Vehicle's title.
13. A representative at Nevada State Bank informed Plaintiff that in order to release the lien, he would need to provide payment to Nevada State Bank.
14. On or about January 7, 2019, Plaintiff mailed a certified check to Nevada State Bank in the amount of \$413.10 in order to obtain the lien release.
15. In the erroneous belief that the statute of limitations on the debt had been revived, Nevada State Bank sold, assigned, or otherwise placed the Account with Knight Adjustment Bureau ("KAB) for the purposes of collections.
16. Shortly thereafter, Plaintiff noticed that KAB had reported the Account to Experian.
17. On or about March 25, 2019, Plaintiff disputed the Account with the Experian by writing it a letter informing it that the information provided by KAB was obsolete.
18. On or about April 2019, Experian responded to Plaintiff's dispute by confirming the aforementioned false information furnished by Plaintiff.
19. Upon information and belief, Defendant Experian failed to conduct a reasonable reinvestigation of Plaintiff's information pursuant to 15 U.S.C. §1681i.
20. As a result of Defendants' conduct, Plaintiff suffered from anger, frustration, anxiety, and humiliation.

Specific Claims

Count I– Negligent Violations of the Fair Credit Reporting Act 15 U.S.C. §1681 Et Seq.

21. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.
22. The foregoing acts and omissions of Defendant constitute negligent violations of the FCRA, including, but not limited to, 15 U.S.C. § 1681i.

Count II– Knowing and/ or Willful Violations of the Fair Credit Reporting Act 15 U.S.C. §1681

Et Seq.

23. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.
24. The foregoing acts and omissions of Defendant constitute knowing and willful violations of the FCRA, including, but not limited to, 15 U.S.C. § 1681i.

Jury Demand

25. Plaintiff hereby demands a trial by jury.

Prayer for Relief

26. WHEREFORE, Plaintiff, by and through his attorney, respectfully prays for Judgment to be entered in favor of Plaintiff and against Defendants as follows:

- a. All actual compensatory damages suffered;
- b. Statutory damages;
- c. Reasonable attorney's fees, litigation expenses, and cost of suit; and
- d. Any other relief deemed appropriate by this Honorable Court.

Dated: October 20, 2020

Respectfully Submitted,

PETERSON LEGAL, PLLC

/s/ Ryan D. Peterson

Ryan D. Peterson (#0389607)
5201 Eden Avenue, Suite 300
Edina, MN 55436
(612) 367-6568
ryan@peterson.legal

ATTORNEY FOR PLAINTIFF

Acknowledgement

Ryan D. Peterson, by signing above, acknowledges that costs, disbursements, witness fees, and reasonable attorneys' fees may be awarded, pursuant to Minnesota Statutes § 549.211, for a party acting in bad faith or asserting a frivolous claim.